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Ser 18000/2566  
20 December 1989

Ms. Meghan Cassidy  
U.S. Environmental Protection Agency  
Region 1  
J.F. Kennedy Federal Building  
Attn: HPS-CAN1  
Boston, Massachusetts 02203

Dear Ms. Cassidy:

Confirming our telephone conversation of December 7, 1989, and in response to your request, the following information is provided concerning the inadvertant excavation at NPL Site 1.

On December 4 and 5, five NASB Public Works employees dug a hole approximately 12 feet in diameter and 8 to 9 feet deep within the general boundaries of NPL Site 1. The purpose of the excavation was to isolate failure in an electrical power cable serving one of the buildings in the compound. The work was stopped by the NASB Environmental Engineer, Mr Apraham, as soon as he became aware of it. Subsequently, a review of EC Jordan Company health and safety data was made for Test Pits TP118 and TP121, which are closest to the this particular hole. Those H&S samples did not trigger any PPE upgrade. Extensive discussions were held with Jordan's Risk and Health Specialist, Mr Reynolds, at their Washington DC office. As a result of those conversations, it was decided not to pursue medical work-ups on the exposed employees because their actual duration on the site was so short and the H&S information for the nearby TPs showed nothing of concern. Further, medical work-ups, without knowledge of pre-exposure background conditions in each employee, would not mean anything. Preliminary results of Round 4 soil samples at both TP's showed no VOA's, Vinyl Chloride, Pesticides or PCB's. There were some semi-VOA's below 7' in both TP's. As you know, semi-VOA's present risk through dermal exposure. Interviews with the affected employees indicate they were not exposed to any liquid in the hole. Further, it was 22 degrees F and 15 degrees F on the 4th and 5th respectively (the wind chill on both days was below 10 degrees F) and the employees were wearing heavy clothes to stay warm and which therefore protected them from direct dermal contact with anything in the hole.

As a result of this incident, NASB has taken the following actions:

- a. Effected employees, the union president and shop steward were briefed about the health implications of the excavation activity, ie: the information discussed in the first paragraph above.
- b. The backhoe used to excavate the hole was impounded at the site and decontaminated following procedures similar to those employed by ECJ during last summer's field work.



c. A memorandum was put out to all Public Works personnel identifying as no digging areas, broad portions of the base which include all the current NPL sites. Digging required in any of these areas will require specific environmental approval and development of appropriate health and safety plans. A copy of the memo is attached.

d. Employees directly involved were also queried about the observed contents of the hole. Debris sighted consisted of plastic sheet material, rags and cloth, wood scraps, some unidentified metal debris and the usual soda cans. A crushed 55 gal drum was also reported. The backhoe operator is the sole remaining employee who operated the Site 1 Landfill before it was closed in 1976. He reported that only empty drums would ever have been disposed of in that area, and that mostly wood and stumps were buried there. One to two feet of fill was noted above the top of the debris. Trash was observed to the full depth of the excavation. There was no liquid in the hole at any point.

I hope this provides sufficient explanation of the incident, and assurance that procedures are now in place to prevent any recurrence.

Sincerely,

GEOFFREY D. CULLISON  
Commander, CEC, U.S. Navy  
Public Works Officer  
By direction of  
the Commanding Officer

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Enclosure

Copy to:  
DEP (Ms. Denise Messier)

*Blind Copy:*  
*Mr. Ron Springfield*